


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TEARIQ BHATTI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 05-690 KAJ
	)	
J.P. MORGAN CHASE, a Delaware	)	
corporation,	)	
	)	
Defendant.	)	

MOTION TO DISMISS

Defendant, by and through the undersigned counsel, hereby moves to dismiss all allegations under 19 Del. C. § 711 (Count II of Plaintiff's Amended Complaint) and all claims arising more than 300 days from the day Plaintiff filed a Charge of Discrimination with the Delaware Department of Labor and/or the EEOC.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

  
\_\_\_\_\_  
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Attorneys for Defendant, J.P. Morgan Chase

Dated: November 15, 2005

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FOR THE DISTRICT OF DELAWARE

TEARIQ BHATTI,	)	
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Plaintiff,	)	
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v.	)	Civil Action No. 05-690 KAJ
	)	
J.P. MORGAN CHASE, a Delaware	)	
corporation,	)	
	)	
Defendant.	)	

ORDER

Defendant, J.P. Morgan Chase's, Motion to Dismiss having been duly presented and heard by the Court,

IT IS NOW HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2005, that Defendant's Motion is hereby granted.

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The Honorable Kent A. Jordan  
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on November 15<sup>th</sup>, I electronically filed a true and correct copy of the foregoing Motion to Dismiss with the Clerk of the Court using CM/ECF, and further caused a copy of same to be served by hand delivery on the following counsel of record:

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YOUNG CONAWAY STARGATT & TAYLOR, LLP



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J.P. Morgan Chase

Dated: November 15<sup>th</sup>, 2005